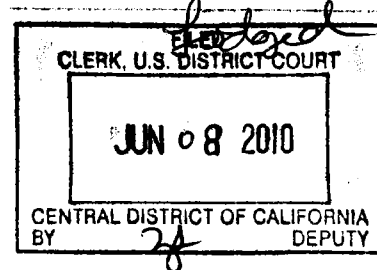
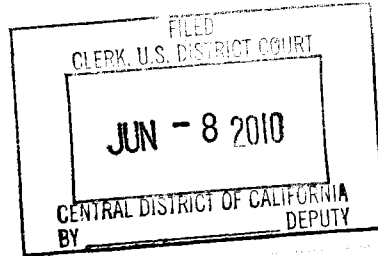


1 Saquib Shoaib, Pro Se  
 2 Photallica, Pro Se  
 3 3745 Veteran Ave.  
 4 Los Angeles, CA 90034  
 5 (310) 291-3847

6 Defendant, Pro Se



7 IN THE UNITED STATES DISTRICT COURT  
 8 FOR THE CENTRAL DISTRICT OF CALIFORNIA

9 Sanrio, Inc and Warner Bros.  
 10 Entertainment Inc.

11 Plaintiffs,

12 vs.

13 Photallica Inc. d/b/a Photallica a/k/a  
 14 Photallica a/k/a Photallica 2 a/k/a  
 15 Photallica II a/k/a Dhocallica;  
 16 Mohammed Sulfi a/k/a Mohammed Zulf  
 17 a/k/a Mohammad Zulf a/k/a Faisal  
 18 Mohammed Yusoof a/k/a Mohammed  
 19 Yosoof a/k/a Mohammed Yusoof a/k/a  
 20 Muhammed Yusoof a/k/a Salim Yusoof  
 21 Aka Salim Yusoof a/k/a Yousuf Salim;  
 22 Photallica; Saquib Shoaib; and Does 3 –  
 23 10, inclusive

24 Defendants.

) Civil Action No.  
 ) CVO9 - 77448 DMG (AGRX)  
 )  
 ) Action Filed: October 14, 2009  
 )  
 ) Honorable Judge Dolly M. Gee  
 )  
 ) Discovery Magistrate Judge  
 ) Alicia G. Rosenberg

) **DEFENDANTS PHOTALLICA AND SAQUIB**  
 ) **SHOAIB'S ANSWER TO FIRST AMENDED**  
 ) **COMPLAINT FOR COPYRIGHT**  
 ) **INFRINGEMENT; TRADEMARK**  
 ) **INFRINGEMENT; UNFAIR COMPETITION;**  
 ) **TRADEMARK DILUTION; DECLARATORY**  
 ) **RELIEF**

25 This action is an attempt by a sophisticated California professional plaintiff known as  
 26 Sanrio, Inc. and Warner Bros. Entertainment Inc. to shake down a two (2) kiosk, defunct, retail  
 27 key tag photo engraving vendor operating out of two Southern California malls. There are  
 28 many different businesses in many different jurisdictions using the name Photallica and  
 Plaintiff only used the name Photallica in Lakewood, CA and Cerritos, CA. Plaintiff's claim is  
 analogous to Warner Bros. suing Office Depot because John Q. Public used Office Depot's  
 photocopy machine to reproduce an image of Hello Kitty. In the matter now before the court,  
 John Q. Public used Defendant Photallica and Saquib Shoaib's metal engraving

1 machine to reproduce an image of Hello Kitty on a piece of inexpensive jewelry.

2 Defendants have no information or knowledge about any of the copy right violations  
3 claimed by plaintiff.

4 Defendant Photallica and Saquib Shoaib for themselves only, in propria persona,  
5 hereby answer Plaintiffs complaint paragraph by paragraph as follows for two (2) defunct  
6 Photallica locations and Saquib Shoaib only:

7  
8 1. Defendants Admit.

9 2. Defendants Admit.

10 3. Defendant Denies. Defendant is a defunct two (2) kiosk photoengraver using personal  
11 images and requests from individual retail customers. Defendant makes no selection or  
12 decision as to which images its customers may choose to have engraved onto an inexpensive  
13 key chain or item of jewelry. Defendant never has, nor had, the ability to mass produce any  
14 items.

15 4. Defendants admit.

16 5. Defendants admit.

17 6. Defendants admit.

18 7. Defendants admit.

19 8. Defendants admit.

20 9. Defendants admit.

21 10. Defendants admit.

22 11. Defendants admit.

23 12. Defendants admit.

24 13. Defendants admit.

25 14. Defendants admit.

26 15. Defendants admit.

27 16. Defendants admit.

28 17. Defendants admit.

1 18. Defendants admit.

2 19. Defendants admit.

3 20. Defendants admit.

4 21. Defendants admit.

5 22. Defendants admit.

6 23. Defendants Potallica and Saquib Shoaib deny that they are infringing upon Plaintiff's  
7 Properties, and deny that they operate any of the listed business except, and admit to at one  
8 time operating one kiosk at 500 Lakewood Center Mall, Lakewood, California 90714 and one  
9 kiosk at 9019 Los Cerritos Mall, and deny any affiliation or association with the other  
10 addresses listed in this paragraph.

11 24. Defendants have no information and belief as to this party and as such cannot answer  
12 on behalf of this defendant and therefore deny.

13 25. Defendants have no information and belief as to this party and as such cannot answer  
14 on behalf of this defendant and therefore deny.

15 26. Defendants admit that they at one time operated now defunct retail kiosks in Lakewood  
16 and Cerritos deny that they infringed upon Plaintiff's Properties within this judicial district.

17 27. Defendant Saquib Shoaib admits for himself and is unable to admit or deny for  
18 defendant Yusoof and therefore denies.

19 28. Defendants Deny.

20 29. Defendants Deny.

21 30. Defendants Deny.

22 31. Defendants repeat all answers contained in paragraphs 1 through 30.

23 32. Defendants Deny.

24 33. Defendants Deny.

25 34. Defendants Deny.

26 35. Defendants Deny.

27 36. Defendants repeat paragraphs 1 through 35.

28 37. Defendants Deny.

- 1 38. Defendants Deny.
- 2 39. Defendants Deny.
- 3 40. Defendants Deny.
- 4 41. Defendants Deny.
- 5 42. Defendants repeat paragraphs 1 through 41.
- 6 43. Defendants Admit.
- 7 44. Defendants Admit.
- 8 45. Defendants Deny.
- 9 46. Defendants Deny.
- 10 47. Defendants Deny.
- 11 48. Defendants Deny.
- 12 49. Defendants Deny.
- 13 50. Defendants Deny.
- 14 51. Defendants Deny.
- 15 52. Defendants Deny.
- 16 53. Defendants repeat paragraphs 1 through 52.
- 17 54. Defendants Admit.
- 18 55. Defendants Admit.
- 19 56. Defendants Deny.
- 20 57. Defendants Deny.
- 21 58. Defendants Deny.
- 22 59. Defendants Deny.
- 23 60. Defendants Deny.
- 24 61. Defendants Deny.
- 25 62. Defendants repeat paragraphs 1 through 61.
- 26 63. Defendants Deny.
- 27 64. Defendants Deny.
- 28 65. Defendants Deny.

1 66. Defendants Deny.

2 67. Defendants Deny.

3 68. Defendants Deny.

4 69. Defendants Deny.

5 70. Defendants Deny.

6 71. Defendants repeat paragraphs 1 through 70.

7 72. Defendants Deny.


8 73. Defendants Deny.

9 **PRAYER FOR RELIEF**

10 That Plaintiffs take nothing by their complaint and that Defendants recover all of their  
11 costs, attorney's fees, legal document assistant fees and other costs incurred in defending  
12 against this lawsuit.

13 Respectfully submitted,

14 Date: June 7, 2010

15   
16 Saquib Shoaib,  
17 Photallica  
18 Defendants Pro Se